

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

DONNA CURLING, *et al.*

Plaintiffs,

v.

BRAD RAFFENSPERGER, *et al.*,

Defendants.

CIVIL ACTION

FILE NO. 1:17-cv-2989-AT

**STATE DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF
TIME TO RESPOND TO CURLING PLAINTIFFS' RENEWAL OF
MOTION FOR ATTORNEY'S FEES AND EXPENSES**

Defendants Raffensperger, in his official capacity as Secretary of State and the Chair of the Georgia State Election Board (the “Secretary”), and State Election Board (“SEB”) Members Sullivan, Worley, Le, and Mashburn (collectively, the “State Defendants”), respectfully move the Court to grant a 16-day extension of time to file its response to Curling Plaintiffs’ Renewal of Motion for Attorney’s Fees and Expenses, [Doc. 998], (“Curling Renewal Motion”).

This Court has already granted a prior request [Doc. 972] by the State Defendants for an extension to respond by December 2, 2020, to the Coalition

Plaintiffs' Renewal of Motion for Attorneys' Fees and Expenses [Doc. 967] (Coalition Renewal Motion").

By way of a brief background, on August 15, 2019, this Court issued an Order granting in part Curling Plaintiffs' Motion for Preliminary Injunction. [Doc. 579]. On August 29, 2019, Curling Plaintiffs filed a Motion for Attorney's Fees and Expenses ("Motion for Fees") as prevailing parties based on that order. [Doc. No. [596-1]. The Court subsequently denied without prejudice Plaintiffs' Motion for Fees on May 26, 2020. [Doc. 733]. Curling Plaintiffs filed their Renewal Motion on November 2, 2020. [Doc. 998]. State Defendants request a 16-day extension of time to file their response with such response due no later than Wednesday December 2, 2020. In support, State Defendants incorporate their good cause showing in its prior request for extension of time to respond filed with this Court with respect to the Coalition Renewal Motion [Doc. 972]. Additionally, State Defendants request the extension described herein so that they may jointly respond to the requests made by both sets of plaintiffs in this case. The Curling Plaintiffs have reached out to Counsel for the State Defendants and stated they would not oppose this Motion.

For the foregoing reasons, State Defendants respectfully request the court grant State Defendants an extension of time to file their response no

later than December 2, 2020. A proposed Order is attached for the Court's convenience.

Respectfully submitted this 9th day of November, 2020.

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L.R. 7.1(D) CERTIFICATION

I certify that this Motion has been prepared with one of the font and point selections approved by the Court in Local Rule 5.1(C). Specifically, this Motion has been prepared using 13-pt Century Schoolbook font.

/s/ Bryan P. Tyson
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